UNITED STATES DISTRICT COURT THE SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Case No. 17-CV-1789 (DLC)

Plaintiff,

v.

LEK SECURITIES CORPORATION, et al.,

Defendants.

DEFENDANTS PUSTELNIK, FAYYER AND AVALON'S MEMORANDUM OF LAW IN SUPPORT OF MOTION IN LIMINE TO PRECLUDE TESTIMONY BY JEROME LAGUILLES CONCERNING DEFENDANTS DOCUMENT PRODUCTIONS

PLEASE TAKE NOTICE that, upon Defendants Sergey Pustelnik, Nathan Fayyer, and Avalon FA Ltd.'s ("Defendants") Memorandum of Law in Support of their Motion *in Limine* to Preclude Testimony by Jerome Laguilles Concerning Defendants' Document Productions and all pleadings, papers and proceedings in this action, Defendants will move this Court before the Honorable Denise L. Cote at the U.S. Courthouse located at 500 Pearl Street, NY, NY, at a date to be determined by the Court, for an Order preclude testimony by Jerome Laguilles concerning Defendants' document productions, and for such other relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's June 12, 2019 Scheduling Order, Plaintiff shall serve opposing papers no later than September 27, 2019, reply papers shall be due October 2, 2019.

Dated: September 13, 2019

Respectfully submitted,

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